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Demi Minor 494475E
 P.O. Box 11401
 Yardville, NJ 08629

DEMI MINOR
 vs

CIVIL Actions

HELENA TOME

Declaration in
 support of Motion for TRP
 & complaint

I, Demi Minor hereby ^{declares} ~~declares~~

I am the plaintiff in the above mentioned case.

I am a Transgender woman & am diagnosed with Gender dysphoria. In April of 2022 I was Advised by EMCF Administration that I was going to be shipped out of state. (

After being notified I authored several grievances explaining how I felt as if it would be unfair to ship me out of state & I explained how I did not feel safe being shipped out of state.

An Attorney began to help me & wrote a letter to the administrator (Defendant stem) ~~informing~~ informing her of the risk that I faced ~~when~~ if shipped out of state (see A1, B1, C-1)

In June 2022 NJDoc did remove the out of state request ()

During same month I was given a unexpected PLEA meeting & shipped out of Clinton to

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a male prison. The reason stated that it was for my safety.

Defendant Tome & Kanden stated that my "drama" placed their jobs on the line. Defendant Kanden stated "You want to keep writing & advocating well now your going to pay for it". Defendant Tome stated "biologically You not the son". Defendant Kanden, Tome & Kalden knowingly & willfully denied me the opportunity to be present at a hearing that subsequently led to me being shipped to a male prison.

Defendant Tome, is the chair of the PREA Accommodation Committee (PAC); She is often responsible for accommodations & placements of transgender inmates.

Defendant Tome, told me "We are tired of your emails & your grievances".

During a subsequent meeting with Ms. Tome, she falsely stated that I was not compliant with my hormones. This false statement was ~~applied as~~ ^{used as} retaliation also used to get me sent back to a male prison yet it was

countered by mental health report (see D-5 Dr. Mabarril ^{approval surgery})

Ms. Tome is not qualified to treat inmates with Gender dysphoria nor does she have a degree in medical/mental health. She is not a medical professional but makes medical decisions.

The Doctor who was treating plaintiff was unaware that Plaintiff was being shipped out on the day she saw here.

Plaintiff has severe mental health issues that place ~~here~~ at risk of self harm & suicide, this was known to defendants.

I attest that after May 2022 I resided in CCU & felt safe where I was at. I understood that I had to serve time in RHU (solitary) & did so without ever getting into trouble.

In May ⁽²⁰²²⁾ around the 25th I submitted a marriage application to Marry another Inmate. Subsequently a keep-separate between me & my intended spouse was entered.

A keep separate order is usually used when a Inmate assaults someone.

MS Tome, during her PAC meeting in which she was the chair of the meeting; she stated you are not the same as other women there are biological differences which is why a keep separate has to be entered for everyone you were friends with.

In response to her statement I explained that it was highly discriminatory for staff to write keep separate orders ~~that~~ simply because I was in a consensual relationship.

I also explained that my engagement in writing grievances should not have impacted in a negative way my housing.

Defendants knew the risk to housing me in a male facility

Dating back to May 2022 when Defendant stem first tried to ship me to another prison I

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Made it clear through my attorney the risk & my fear of being sent to a male facility. More importantly I communicated through my attorney the continued efforts of staff to pressure me.

On ^{5/16/22} ~~5/18/22~~, 7/8/22 & 7/25/22 My attorney represented the risk of me being in a male facility.

Current Risk in Male Facility

I currently fear for my safety within male facility. I have been raped within the male facility & did report said rape to officials.

As of 10-17/22 I am approved for surgery & do not believe it would be safe for me to remain in a male facility.

I am approved for Vaginoplasty, Orchiectomy & Breast augmentation. (D-1-D-8 Attachments) Exhibits

It took the agency nearly 13 months to finalize my approval.

I now fear that I will be further victimized ~~with~~ following surgery. I have also asked for safety (Gender Based housing) while I prepare for surgery.

I Demi-Minor hereby Declare under federal statute that the foregoing statements are true.

Date 10/19/22

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Demi Minor